

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

JOSE EUSEBIO MEDRANO

NO. 3:24-MJ-270-BK

**MOTION FOR DETENTION AND  
MOTION TO CONTINUE DETENTION HEARING**

The United States moves for pretrial detention of defendant, **Jose Eusebio Medrano**, pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

☒ Crime of violence (18 U.S.C. §3156);

☐ Maximum sentence life imprisonment or death;

☐ 10 + year drug offense;

☐ Felony, with two prior convictions in above categories;

☒ Serious risk defendant will flee;

☐ Serious risk obstruction of justice;

☐ Felony involving a minor victim;

☐ Felony involving a firearm, destructive device, or any other  
dangerous weapon; or

☐ Felony involving a failure to register (18 U.S.C. § 2250).

2. Reason for Detention: The Court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

  X   Defendant's appearance as required;

  X   Safety of any other person and the community

3. Rebuttable Presumption: The United States will invoke the rebuttable presumption against defendant because (check all that apply):

       Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. § 924(c);

       Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. § 2332b(g)(5);

       Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§ 1201 and 2251; or

       Previous conviction for "eligible" offense committed while on pretrial bond.

4. Time for Detention Hearing: The United States requests the Court conduct the detention hearing,

       At first appearance

  X   After continuance of   3   days (not more than 3).

Respectfully submitted,

LEIGHA SIMONTON  
UNITED STATES ATTORNEY

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**CERTIFICATE OF NON-SERVICE**

I hereby certify that a true and correct copy of this document was filed via the Court's CM/ECF System on this 20<sup>th</sup> day of March 2024.

/s/ Edward Hocter  
EDWARD HOCTER  
Assistant United States Attorney